

UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA,

Plaintiff,

vs.

Case No. 15-CR-10070-IT

MICHAEL J. CUOMO,
KEVIN J. MANN, SR.,

Defendants.

GOVERNMENT'S MEMORANDUM FOR INTERIM STATUS CONFERENCE

The United States respectfully submits this memorandum in advance of the interim status conference scheduled in the above-captioned matter.

(1) Status of Automatic Discovery:

In addition to certain discovery provided pre-Indictment, the government has made available to the defendants for their review millions of pages of documents as part of its automatic discovery obligations. Given the exceedingly voluminous nature of this discovery, however, the parties have been working diligently to process and produce to the defendants in an acceptable format the material previously made available, which would permit defendants to examine the discovery in a more efficient manner. Since the beginning of discovery in August 2015, the government has made a number of productions to counsel for defendant Mann (who accepted service on behalf of defendant Cuomo as well), totaling over 2.1 million records. On May 20, 2016, the government produced a few hundred additional pages of documents to each defendant individually. As the government has informed the defendants, it considers its production of documents to be substantially complete (any additional documents to be produced

will be of very small volume). As such, from the government's perspective, the case is ready for referral to the District Court, though the defendants may seek additional time to review the voluminous productions to date.

(2) Excludable Delay:

The defendants previously waived their Speedy Trial rights and agreed that the period from arraignment through May 24, 2016 is excludable time.

Respectfully submitted,

CARMEN M. ORTIZ
United States Attorney

By: */s/ Vassili Thomadakis*
VASSILI THOMADAKIS
Assistant U.S. Attorney

Dated: May 24, 2016

CERTIFICATE OF SERVICE

I hereby certify that this document, filed through the ECF system will be sent electronically to the registered participants as identified on the Notice of Electronic Filing (NEF).

Dated: May 24, 2016

/s/ Vassili Thomadakis
VASSILI THOMADAKIS